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April 21, 2016

BY ECF AND HAND DELIVERY

Honorable Debra Freeman
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Kenneth Creighton v. City of New York, et al., 1:12-cv-07454-PGG-DCF

Your Honor:

I am a Senior Counsel in the Office of Zachary W. Carter, Corporation Counsel of the City of New York, and the attorney representing defendants in the above-referenced matter. Pursuant to Your Honor's Order made orally via telephone during the second day of the deposition of defendant Godino on April 19, 2016, please find enclosed unredacted copies of the files related to defendant Godino's and defendant Roberts's Civilian Complaint Review Board ("CCRB") complaints, aside from those related solely to allegations of excessive force, for Your Honor's in camera review.

Defendants are currently in the process of obtaining the files related to defendant Godino's and defendant Roberts's Internal Affairs Bureau ("IAB") complaints however, as explained during the April 19, 2016 telephone conference, we expect that it will take some time to obtain those files.

Thank for you for your consideration of this matter.

Respectfully submitted,

/s/ **Kavin Thadani**

Kavin Thadani
Senior Counsel
Special Federal Litigation Division

Encls.

cc: **BY ECF**
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